

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, Both  
individually and as Legal Guardian of  
Shane Allen Loveland; and JACOB  
SUMMERS

CASE NO. 8:18CV127

Plaintiff(s),

v.

THE GOODYEAR TIRE & RUBBER  
COMPANY

Defendant(s).

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**DECLARATION OF KYLE WAYNE FARRAR IN SUPPORT OF PLAINTIFFS' BRIEF  
IN OPPOSITION TO GOODYEAR'S MOTION TO PRECLUDE PLAINTIFFS'  
PURPORTED TIRE FAILURE EXPERT, DAVID SOUTHWELL, FROM OFFERING  
OPINIONS FIRST DISCLOSED IN HIS MARCH 4, 2020 SECOND  
SUPPLEMENTAL REPORT AT TRIAL**

I, Kyle Wayne Farrar, declare as follows:

My name is Kyle Wayne Farrar. I understand the nature of this oath, and I am competent to testify to the matters stated in this Declaration. This testimony is based on my own personal knowledge, and the facts state herein are true and correct.

True and accurate copies of each of the documents identified as Exhibits in Plaintiffs' Brief in Support of their Opposition to Goodyear's Motion to Preclude Plaintiffs' Purported Tire Failure Expert, David Southwell, From Offering Opinions first Disclosed in His March 4, 2020 Second Supplemental Report at Trial are attached to the Index in Support of Plaintiffs' Brief in Opposition to Goodyear's Motion to Preclude Plaintiffs' Purported Tire Failure Expert, David Southwell, From Offering Opinions first Disclosed in His March 4, 2020 Second Supplemental Report at Trial.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this March 12, 2020 in Houston, Texas.

By:   
\_\_\_\_\_  
Kyle Wayne Farrar